

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2013-392-E

In the Matter of:	)	
	)	
Joint Application of Duke Energy	)	
Carolinas, LLC and North Carolina	)	
Electric Membership Corporation for a	)	MOTION FOR ADMISSION
Certificate of Environmental Compatibility	)	<i>PRO HAC VICE</i>
and Public Convenience and Necessity for	)	
the Construction and Operation of a		
750MW Combined Generating Plant Near		
Anderson, SC		

Petitioners the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy hereby move the South Carolina Public Service Commission (“Commission”) to permit Gudrun Elise Thompson to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Thompson, with the consent of counsel of record, is simultaneously filing with the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully request that this motion be granted.

This 20th day of December, 2013.

s/ J. Blanding Holman, IV  
J. Blanding Holman, IV  
Southern Environmental Law Center  
43 Broad Street, Suite 300  
Charleston, SC 29401  
Telephone: (843) 720-5270  
Fax: (843) 720-5240

*Attorney for Petitioners South Carolina  
Coastal Conservation League and  
Southern Alliance for Clean Energy*

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Joint Application of Duke Energy Carolinas, LLC and North Carolina Electric Membership Corporation for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750MW Combined Generating Plant Near Anderson, SC

Docket No. 2013-392-E

Public Service Commission of South Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Defendant

Comes now Gudrun Elise Thompson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

5423 Bobcat Road

Street Address

Chapel Hill

Orange

North Carolina

27516

City

County

State

Zip Code

919-968-4643

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern

Environmental Law Center, with offices at, at

601 W. Rosemary Street, Suite 220

Street Address

Chapel Hill

Orange

North Carolina

27516

City

County

State

Zip Code

919-967-1450

Telephone

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since August of 2002, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

North Carolina state courts	August 27, 2002
US District Court for the Eastern District of North Carolina	September 5, 2002

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Not Applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not Applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Not Applicable

9. Local counsel of record associated with applicant in this case is J. Blanding Holman, IV, of the Southern Environmental Law Center law firm, which has offices at:

43 Broad Street, Suite 300

Street Address

Charleston

Charleston

South Carolina

29401

County

City

State

Zip Code

843-720-5270

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

Not Applicable

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Case Name: In the Matter of: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs (S.C. Public Service Commission)

Docket No. 2007-358-E

Status: Docket closed

Date of Application: January 25, 2008

Application Granted

Local Counsel of Record: J. Blanding Holman IV

Case Name: Environmental Defense Fund, et al. v. S.C. Department of Health and Environmental Control (South Carolina Administrative Law Court) No. 09-ALJ-07-0166-CC

Status: Case dismissed with prejudice pursuant to consent order

Date of Application: May 4, 2009

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: In the Matter of: Application of Duke Energy Carolinas LLC for Authority to Adjust and Increase Its Electric Rates and Charges (S.C. Public Service Commission) Docket No. 2009-226-E

Status: Docket open

Date of Application: November 6, 2009

Application Granted

Local counsel of record: J. Blanding Holman IV

Case Name: South Carolina Electric & Gas Company's Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency Programs, (S.C. Public Service Commission) Docket No. 2009-261-E

Status: Docket open

Date of Application: January 12, 2010

Application Granted

Local counsel of record: J. Blanding Holman IV

Case Name: Application Regarding the Acquisition of Progress Energy, Inc. by Duke Energy Corporation and Merger of Progress Energy Carolinas, Inc. and Duke Energy Carolinas, LLC (S.C. Public Service Commission ) Docket No. 2011-158-E

Status: Docket open

Date of Application: October 4, 2011

Application Granted

Local counsel of record: J. Blanding Holman IV

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 20th day of December, 2013.

[Signature]  
APPLICANT

VERIFICATION

STATE OF North Carolina)

COUNTY OF Orange)

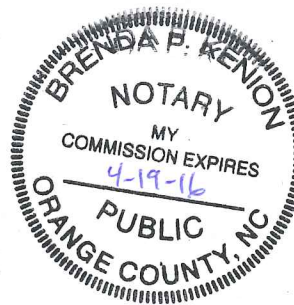
I, Gudrun Elise Thompson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 20th day of December, 2013.

[Signature]  
Brenda P. Kenion  
Notary Public for the State of NC

My Commission Expires: 4/19/16



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 20th day of December, 2013.

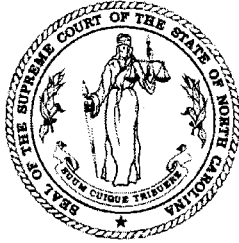
[Signature] with express permission by Robin Dunn  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 20th day of December, 2013.

[Signature]  
APPLICANT/AFFIANT

# Supreme Court OF THE STATE OF NORTH CAROLINA



I, Christie S. Cameron Roeder, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 27, 2002, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

**GUDRUN ELISE THOMPSON**

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this December 10, 2013.

A handwritten signature in cursive script, reading "Christie S. Cameron Roeder".

Christie S. Cameron Roeder  
Clerk of the Supreme Court  
of the State of North Carolina

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2013-392-E

In the Matter of: )  
)  
Joint Application of Duke Energy )  
Carolinas, LLC and North Carolina )  
Electric Membership Corporation )  
for a Certificate of Environmental )  
Compatibility and Public )  
Convenience and Necessity for the )  
Construction and Operation of a )  
750MW Combined Generating Plant )  
Near Anderson, SC )

CERTIFICATE OF SERVICE

---

I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Len S. Anthony, Counsel  
NC Electric Membership Corporation  
1701 N. Ocean Blvd.  
N. Myrtle Beach, SC 29582  
Len.anthony1@gmail.com

Richard M. Feathers  
Vice President & Assoc. General Counsel  
PO Box 27306  
Raleigh, NC 27611  
rickfeathers@ncemcs.com

Richard L. Whitt  
Austin & Rogers, P.A.  
508 Hampton Street, Suite 300  
Columbia, SC 29201  
rlwhitt@austinrogerspa.com

Timika Shafeek-Horton, Counsel  
Duke Energy Carolinas, LLC  
P.O. Box 1321 (DEC 45A)  
Charlotte, NC 28201  
timika.shafeek-horton@duke-energy.com

Nanette S. Edwards, Counsel  
Shannon Bowyer Hudson, Counsel  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
shudson@regstaff.sc.gov  
nsedwar@regstaff.sc.gov

Jacquelyn S. Dickman  
Deputy General Counsel  
SC Dept. of Health & Environmental  
Control  
SC DHEC  
2600 Bull Street  
Columbia, SC 29201  
dickmajs@dhec.sc.gov

Alvin A. Taylor, Director  
SC Dept. of Natural Resources  
PO Box 167  
Columbia, SC 29202  
taylora@dnr.sc.gov

Duane Parrish, Director  
SC Dept. of Parks, Recreation and  
Tourism  
1205 Pendleton St. Suite 248  
Columbia, SC 29201  
dparrish@scprt.com

Doug Jennings  
Douglas Jennings Law Firm, LLC  
Post Office Box 995  
Bennettsville, SC, 29512  
doug@jenningslawoffice.com

Charles L.A. Terreni  
Terreni Law Firm, LLC  
1508 Lady Street  
Columbia, SC 29201  
Charles.terreni@terrenilaw.com

John H. Tiencken  
Paul J. Conway  
Tiencken Law Firm, LLC  
234 Seven Farms Drive, Suite 114  
Charleston, SC 29492  
jtiencken@tienckenlaw.com  
pconway@tienckenlaw.com

This 20th day of December, 2013.

s/ Robin G. Dunn